

**Etzig, Trista**

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**From:** DCharna@gloryfoods.com  
**Sent:** Monday, May 22, 2006 11:38 AM  
**To:** Scblockgrants,  
**Subject:** Specialty Crop Block Grant Program  
**Attachments:** ATTACHMENT.TXT



May 22, 2006

Docket Clerk, Fruit and Vegetable Programs  
 Agricultural Marketing Service  
 U.S. Department of Agriculture  
 1400 Independence Avenue, SW.  
 Stop 0243  
 Washington, DC 20250-0243  
 Attn: Trista Etzig

Dear Ms. Etzig,

On behalf of Glory Foods, Inc., I am providing comments in response to the April 20, 2006 proposed rule: *Specialty Crop Block Grant Program; Notice of Request for Approval of a New Information Collection*. Glory Foods is the market leader in both canned as well as fresh cut greens including Collard, Turnip, Mustard and Kale greens.

This rulemaking is an important step in assuring that specialty crop block grant funds are used appropriately by states to enhance the competitiveness of specialty crops with the ultimate goal of helping consumers improve their health by eating more fruits and vegetables.

Glory Foods would like to highlight two major concerns with the proposed rule:

1. The rule is inconsistent with the clear intent of Congress when it passed the Specialty Crop Competitive Act in 2004 (Public Law 108-465) and will limit consumer choice by excluding the promotion of all types of specialty crops – including canned fruits and vegetables.

Section 1290.4 of the proposed rule: *Eligible grant project*, states that:

- (a) To be eligible for a grant, the project(s) must enhance the competitiveness of specialty crops.  
**Priority will be given to fresh specialty crop projects.**

5/22/2006

This language is inconsistent with the authorizing legislation and will limit competitiveness and ultimately consumer choice. Congress did not intend for one form of specialty crop to be given priority over others, nor to restrict state departments of agriculture from promoting a variety of specialty crops. USDA has exceeded its regulatory authority in giving preference to fresh specialty crops.

2. The rule does not recognize the growing body of evidence on the benefits of canned fruits and vegetables.

The proposed rule is counter to federal guidelines on nutrition. The ***Dietary Guidelines for Americans 2005*** identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits and vegetables. Nowhere in the Dietary Guidelines is preference given for fresh fruits and vegetables. The attached fact sheet – “Can Fit” – highlights the many positive attributes associated with canned fruits and vegetables, including their nutrient profile, consumer preference, nutrient losses for fresh produce, nutrient retention for canned and food safety.

On behalf of Glory Foods, Inc. thank you for considering these comments. We urge the USDA to issue a final rule that is consistent with the will of Congress and recognizes the importance of promoting all types and forms of healthy and nutritious specialty crops. As proposed, this rule will restrict promotion efforts and is counter to open competition. It also does not reflect current scientific knowledge of the importance of all types and forms of fruits and vegetables in promoting health.

Sincerely,

*Daniel A. Charna*

Daniel A. Charna  
VP Operations/Treasurer  
614-252-2042 ext. 117

Information about Glory Foods can be found at: [www.gloryfoods.com](http://www.gloryfoods.com)